

I support the petition of Aircraft Owners and Pilots Association (AOPA) for rulemaking, pursuant to 14 CFR 91.137 and 14 CFR 91.139, to revise SFAR 94 to allow pilots vetted at College Park Airport (CGS), Potomac Airpark (VKX) and Hyde Field (W32) to conduct flights to any of the three SFAR 94-impacted airports, and to conduct air traffic pattern work, subject to the other provisions of this rule, and to permit transient operations into these three airports, subject to the security provisions of this amended rule, for the following reasons:

1. Vetted pilots operating out of the DC3 airports are not a threat to national security. Before September 11, such pilots made many daily takeoffs and landings at these airports for at least 50 years (CGS is the oldest continuously operating airport) without any harm to national security. Given the proposal to vet pilots, it is a poor tradeoff to prohibit all these flight operations going forward to eliminate the slight risk that a vetted pilot could harm national security.

2. The DC3 airports are an important gateway to the DC area. CGS is walking distance to the College Park metro stop, and the other airports are similarly close to the city. Without access to the DC3 airports, transient pilots do not have any comparable alternative airports to conveniently fly to the Washington area. I personally used to make several trips a year from Boston to CGS, and have been highly inconvenienced by my inability to fly to CGS since September 11, 2001.

3. The DC3 airports can only handle very small planes due to their short runway lengths. Given the slow speed and small cargo capacity of such small planes, they are of very little risk to national security when flown by vetted pilots. The Washington area is heavily monitored by radar-equipped controllers, who can easily detect a deviation from flight plan by a small, slow aircraft, further limiting the potential risk. Larger aircraft such as charter jets may pose an additional risk that would justify further vetting of their flights, but such jets cannot operate out of the DC3 airports.

4. Before September 11, the DC3 airports supported several aviation-related small businesses, such as flight schools and aircraft repair stations. The FAA should make a maximum effort to find a reasonable system that protects national security while allowing small planes to fly into the DC3 airports, so these small businesses can resume operation.